

Alexa J. Laborda Nelson (N.J. Bar No. 027442012)

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*Attorneys for Defendants Tesla, Inc.;*

*Tesla Motor, Inc.; Tesla, Inc. d/b/a*

*Tesla Motors, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Adam Williams,

Plaintiff,

vs.

Tesla, Inc.; Tesla Motor, Inc.; Tesla, Inc. d/b/a  
Tesla Motors, Inc.; and John Does 1-5 and 6-10,

Defendants.

Case No. 1:18-cv-04120-JHR-AMD

**DEFENDANTS' APPLICATION FOR  
EXTENSION OF TIME TO ANSWER,  
MOVE OR OTHERWISE REPLY  
(LOCAL RULE 6.1(B))**

Application is hereby made pursuant to Local Rule 6.1(b) for a Clerk's Order extending the time within which Defendants Tesla, Inc.; Tesla Motor, Inc.; and Tesla, Inc. d/b/a Tesla Motors, Inc. (hereinafter "Defendants")<sup>1</sup> may answer, move, or otherwise reply to the Complaint filed by Plaintiff Adam Williams by 14 days. Defendants represent that:

1. No previous extension has been obtained to respond to Plaintiff's Complaint;
2. This Action was removed to this Court on March 23, 2018;
3. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), the time to answer a complaint in a removed action is 7 days after the Notice of Removal is filed;

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<sup>1</sup> The only proper defendant in this matter is Tesla, Inc. Tesla Motor, Inc. underwent a corporate name change and is now Tesla, Inc.

4. The time to answer, move, or otherwise reply to the Complaint expires on March 30, 2018; and

5. The requested 14 day extension would make the time to answer, move, or otherwise reply to the Complaint April 13, 2018.

Respectfully submitted,

/s/ Alexa J. Laborda Nelson

Alexa J. Laborda Nelson  
LITTLER MENDELSON, P.C.  
Attorneys for Defendants Tesla, Inc.; Tesla  
Motor, Inc.; Tesla, Inc. d/b/a Tesla Motors,  
Inc.

Dated: March 26, 2018

**ORDER**

The above application is ORDERED GRANTED and the time within which Defendants shall answer, move, or otherwise reply to Plaintiff's Complaint is extended from March 30, 2018 to April 13, 2018.

ORDER DATED: \_\_\_\_\_, 2018

WILLIAM T. WALSH, Clerk

By: \_\_\_\_\_  
Deputy Clerk

**CERTIFICATE OF SERVICE**

I, Alexa J. Laborda Nelson, hereby certify that I caused to be served the foregoing **Application for Extension of Time to Answer, Move, or Otherwise Reply to the Complaint filed by Plaintiff Adam Williams**, via first class mail and email, upon the following:

Toni L. Telles, Esq.  
Law Offices of Eric A. Shore  
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*Counsel for Plaintiff Adam Williams*

/s/ Alexa J. Laborda Nelson  
Alexa J. Laborda Nelson

Dated: March 26, 2018